

LAW OFFICES OF JEANNIE L. BERGSTEN
100 Garden City Plaza, Suite 412B
Garden City, New York 11530
Telephone: 516-551-9577
Facsimile: 516-227-2108
Attorneys for Defendant Tori O'Toole, Inc.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
-----X
JERRY CANKAT, Individually,

Plaintiff,
-----X
-against-
15-cv-581 (SJ) (VMP)
Hon. Sterling Johnson, Jr.

TORI O'TOOLE'S, INC., d/b/a
TORI O'TOOLE'S, a New York
for profit corporation,

Defendant.
-----X .

**NOTICE OF MOTION FOR EXTENSION OF TIME TO ANSWER
OR TO OTHERWISE MOVE AGAINST THE COMPLAINT**

PLEASE TAKE NOTICE that, pursuant to Rule 6 of the Federal Rules of Civil Procedure, Defendant Tori O'Toole, Inc. will move before this Honorable Court, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a time and date to be set by the Court, for an Order granting Defendant an extension of time to file and serve its Answer and Affirmative Defenses and/or to otherwise move against the Complaint; and for such further relief deemed just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Defendant relies upon the accompanying Memorandum of Law, the Affirmation of Jeannie L. Bergsten dated March 20, 2015, the exhibits annexed thereto, and all prior proceedings in this action.

Dated: Garden City, New York
March 20, 2015

LAW OFFICES OF JEANNIE L. BERGSTEN

By: _____

Jeannie L. Bergsten (JB 8879)
Attorneys for Defendant Tori O'Toole, Inc.
100 Garden City Plaza, Ste. 412B
Garden City, New York 11530
Tel: 516-551-9577
Fax: 516-227-2108
Email: JeannieB@JLBAttorney.com

TO: Tara Demetriades, Esq.
ADA Accessibility Associates
1076 Wolver Hollow Road
Oyster Bay, New York 11771
516-595-5009